

Chief, Rulemaking, Directives and Editing Branch  
U.S. Nuclear Regulatory Commission

The Pennsylvania Department of Environmental Protection (PA DEP) has completed its review of the draft Supplemental Environmental Impact Statement (SEIS) for License Renewal of Beaver Valley Power Station (BVPS), Units 1 and 2. The following is a summary of the department's comments and observations:

### **Air Quality**

**Asbestos:** Asbestos containing materials (ACM) may be present on-site. In the event that the project includes the disturbance of any ACM, it may be subject to the federal asbestos regulations found at 40 CFR Part 61, Subpart M, beginning at CFR 61.140.

**Fugitive Emissions:** Construction and earthmoving activities must comply with 25 Pa. Code Sections 123.1 and 123.2. These sections generally require that: 1) reasonable measures must be taken to minimize airborne dust nuisances from construction activities, 2) any dirt drag-out onto paved streets must be promptly removed, and 3) any airborne dust generated from construction activities may not visibly cross off-property.

### **Environmental Cleanup:**

The draft SEIS does not include the installation of additional storage tanks if the BVPS license is renewed. At the time of decommissioning, the tanks will have to be properly closed/removed under the direct on-site supervision of a certified tank remover in accordance with regulations contained in Title 25 PA Code Chapter 245. There are no outstanding enforcement actions listed in Department's eFACTS against this facility.

### **Radiological:**

PA DEP has no major concerns with the draft SEIS as we had previously provided extensive comments to the NRC on the draft Generic Environmental Impact Statement for License Renewal of Nuclear Power Plants, NUREG-1437. Additionally, PA DEP staff participated in the NRC environmental audit of the license renewal application at BVPS and will continue to implement an independent radiological environmental monitoring program at BVPS and other Pennsylvania nuclear power plants.

We would however like to request that the final SEIS (preferably Section 2.2.7.1) include a summary of the on-site radiological groundwater monitoring program at BVPS, including a map of the existing on-site monitoring wells. In addition, information regarding the scope of sampling program and the location of any future monitoring wells that may be planned would be highly desirable.

Regarding management and disposal of low-level radioactive waste (LLRW), it is our understanding that at the current waste generation rate, the existing LLRW storage facility at BVPS is capable of storing Class B and C wastes for several years following the closure of Barnwell disposal facility to the generators outside the Atlantic Compact (Connecticut, New Jersey and South Carolina).

This should also be confirmed in Section 2.1.4.3 of SEIS. Also, Section 2.1.5.5 of the SEIS, "Pollution Prevention and Waste Minimization", is silent on licensee's plan for minimizing radioactive waste. We request that the SEIS include a brief description of the licensee's current and future plans to further minimize the generation of LLRW and specifically, Class B and C wastes. Additionally, in Section 3.1 of the SEIS, line 31, the licensee describes the storage building for the old unit 2 steam generator as being a "permanent" storage building. This is not accurate since it is expected that the old steam generator and its storage building will be removed from the site during decommissioning activities.

Regarding storage of spent nuclear fuel (SNF), the Commonwealth has publicly expressed concerns about long-term storage of SNF on-site. We have been a strong advocate for the creation of a permanent national repository of SNF and high-level radioactive waste at the Yucca Mountain site in Nevada.

**Waste Management (Non-Radiological):**

During decommissioning of the plant, the licensee should consider deconstruction and salvage to reduce waste disposal to the extent possible. All construction and demolition waste that cannot be salvaged or recycled should be properly transported and disposed of at a DEP-permitted facility. Open burning of waste is not acceptable.

**Watershed Management:**

Construction of new facilities or other site work that would encroach on waterways or wetlands, or earth disturbance of more than 1 acre would require appropriate Permits or approvals.

We appreciate the opportunity to provide comments on the draft SEIS for the License Renewal Application being considered for BVPS by the NRC.